

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

X

JAMES FISCHER,

Plaintiff,

Case No. 15 CV 6266 – AJN-AJP

v.

Judge Nathan

DEAN ERIC STIGLITZ,
LAURIE ANNE HERBOLDSHEIMER,
GOLDEN RULE HONEY, LLC,

Defendants.

**NOTICE OF MOTION
TO DISMISS BY
HERBOLDSHEIMER
AND GOLDEN RULE**

X

PLEASE TAKE NOTICE THAT on upon the annexed declaration of Dennis M. Perlberg, Esq., dated December 4, 2015, the Affidavit of Defendant, Dean Eric Stiglitz, dated December 3, 2015, and upon the exhibits annexed hereto and the accompanying Memorandum of Law in support of this motion, Defendants, Herboldsheimer and Golden Rule, by and through their attorneys, Speyer & Perlberg, LLP, shall move this Court, before the Honorable Alison J. Nathan, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an order pursuant to FRCP 12(b)(2) granting the dismissal of the complaint on the grounds that this Court does not have personal jurisdiction upon them and pursuant to FRCP 12(b)(6) and on the grounds that the causes of action alleged against Herboldsheimer fail to state a claim upon which relief can be granted, along with such other and further relief as this Court may deem just and proper.

Dated: Melville, New York
December 4, 2015

SPEYER & PERLBERG
Attorneys for Defendants

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